

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 7
Geneseas Holdings US LLC,	Case No. 22-10595 (CTG)
Debtor.	Hearing Date: To Be Heard With TFR Objection Deadline: TBD
In re:	Chapter 7
Tropical Aquaculture Products, Inc.,	Case No. 22-10596 (CTG)
Debtor.	

**FIRST & FINAL FEE APPLICATION OF
CHIPMAN BROWN CICERO & COLE, LLP, ATTORNEYS FOR
DAVID W. CARICKHOFF, CHAPTER 7 TRUSTEE, FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
NOVEMBER 16, 2023 THROUGH FEBRUARY 27, 2025**

<i>Name of Applicant:</i>	Chipman Brown Cicero & Cole, LLP
<i>Authorized to Provide Professional Services to:</i>	David W. Carickhoff, Chapter 7 Trustee
<i>Date of Retention:</i>	December 26, 2023, effective November 16, 2023
<i>Period for which Compensation and Reimbursement is Sought:</i>	November 16, 2023 through February 27, 2025
<i>Amount of Compensation Sought as Actual, Reasonable, and Necessary:</i>	\$4,820.50 ¹
<i>Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary:</i>	\$87.79

¹ CBCC has included \$1,000.00 in this request for anticipated time to prepare for the hearing on the Trustee's Final Report and final fee applications, as well as other case closing matters. CBCC will file a certification prior to the hearing date certifying that CBCC has incurred at least this amount of fees during this time or will reduce its request accordingly.

This is an: Interim ✓ Final Application Monthly Statement

SUMMARY OF PRIOR FEE APPLICATIONS

[None]

**ATTACHMENT B
TO FINAL FEE APPLICATION
NOVEMBER 16, 2023 THROUGH FEBRUARY 27, 2025**

NAME OF PROFESSIONAL	POSITION, YEAR ASSUMED	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Bryan J. Hall	Partner DE Admission 2016. NY Admission 2012.	\$495.00	4.90	\$2,425.50
Michelle Dero	Paralegal	\$275.00 (FY2023)	1.8	\$495.00
		\$300.00 (FY2024)	1.8	\$540.00
Rosanne DellAversano	Paralegal	\$250.00	1.2	\$360.00
Grand Total:			9.7	\$3,820.50²
Blended Rate		\$393.87		

² See footnote 1 above.

SUMMARY OF PROFESSIONAL FEES BY ACTIVITY CODE
NOVEMBER 16, 2023 THROUGH FEBRUARY 27, 2025

Project Category	Total Hours	Total Fees
B110 Case Administration	1.70	\$724.50
B150 Meeting of and Communications with Creditors	1.30	\$643.50
B160 Fee/Employment Application	6.50	\$2,353.50 ³
B240 Tax Issues	0.20	\$99.00
TOTAL:	9.7	\$3,820.50

SUMMARY OF REIMBURSABLE EXPENSES DURING THE PERIOD
NOVEMBER 16, 2023 THROUGH FEBRUARY 27, 2025

EXPENSE CATEGORY	SERVICE PROVIDER	TOTAL EXPENSES
Mailing Services	Reliable	\$19.23
Printing & Mailing Services	DLS	\$14.24
Computer Data Research	PACER Service Center	\$10.70
Postage	Firm	\$43.62
TOTAL:		\$87.79

³ This amount includes \$600 for the preparation of this first and final fee application. Given that CBCC's efforts have been focused on assisting the Trustee in winding up these estates efficiently, CBCC respectfully submit that such amount is reasonable and should be approved.

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NOVEMBER 16, 2023 THROUGH FEBRAURY 27, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Rule 2016-2, Chipman Brown Cicero & Cole, LLP (“CBCC”), counsel to David W. Carickhoff, the Chapter 7 Trustee (the “Trustee”), hereby submits the *First & Final Fee Application of Chipman Brown Cicero & Cole, LLP, Attorneys for David W. Carickhoff, Chapter 7 Trustee for Compensation and Reimbursement of Expenses for the Period of November 16, 2023 through February 27, 2025* (the “Fee Application”).

By this Fee Application, CBCC seeks allowance of compensation in the amount of \$4,820.50¹ and actual and necessary expenses in the amount of \$87.79, for a total of \$4,908.29,

¹ CBCC has included \$1,000.00 in this request for anticipated time to prepare for the hearing on the Trustee’s Final Report and final fee applications, as well as other case closing matters. CBCC will file a certification prior to the hearing date certifying that CBCC has incurred at least this amount of fees during this time or will reduce it request accordingly.

and payment of the unpaid amount of such fees and expenses, for the period of November 16, 2023 through February 27, 2025 (the “Application Period”).

JURISDICTION

1. The District of Delaware has jurisdiction over this matter under 28 U.S.C. §1334(b), which has been referred to this Court. This matter is a core proceeding within the meaning of 28 U.S.C. §157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§1408 and 1409. The predicates for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, and Local Rule 2016-2.

BACKGROUND

2. On June 30, 2022 (the “Petition Date”), each of the Debtors filed with this Court a voluntary petition for relief under chapter 7 of the Bankruptcy Code.

3. On July 6, 2022, David W. Carickhoff was appointed as Chapter 7 Trustee.

4. The meeting of creditors was held and concluded on July 27, 2022.

5. On December 6, 2023, the Trustee filed the *Application of the Chapter 7 Trustee for Entry of an Order the Employment of Chipman Brown Cicero & Cole, LLP as General Bankruptcy Counsel to the Chapter 7 Trustee, Effective as of November 16, 2023*. The Court approved the employment of CBCC, effective as of November 16, 2023, by order entered December 26, 2023.

6. CBCC is a nationally recognized law firm with extensive experience and expertise in bankruptcy and reorganization proceedings, particularly with respect to the representation of debtors, creditors’ committees, and chapter 7 trustees.

FEE APPLICATION

7. During the Application Period. CBCC performed all necessary and appropriate professional services as general bankruptcy counsel to the Trustee. A detailed invoice setting forth

CBCC's professional fees and reimbursable expenses for the Application Period is attached hereto as Exhibit A. The reasonable value of the professional services rendered by CBCC during the Application Period as incurred by CBCC to the Trustee in connection with this matter during the Application Period is \$4,820.50.¹

8. The CBCC professionals who rendered professional services during the Application Period are identified in Attachment B to this Fee Application (see above).

9. The rates charged are CBCC's normal hourly rates for work of this nature

10. No prior fee applications have been filed by CBCC in these chapter 7 cases.

SUMMARY OF SERVICES BY PROJECT

(a) **B110: Case Administration**

Fees: \$724.50

Total Time: 1.70

This category includes tasks related to case management, monitoring docket updates, electronic filing, preparing certificates of no objection and hearing agendas, research and general matters of administration. Among other things, during the Application Period, CBCC prepared various administrative filings, including certificates of no objection and hearing agendas.

(b) **B150: Meetings and Communications with Creditors**

Fees: \$643.50

Total Time: 1.30

This category includes all matters related to communicating with creditors and other stakeholders.

(c) **B160: Fee/Employment Applications**

Fees: \$2,353.50

Total Time: 6.5

This category includes time spent preparing, reviewing and filing applications to employ the Trustee's professionals, reviewing and filing the final fee application of Giuliano Miller & Company, \$600 for preparation of this Fee Application, and related work.

(d) B240: Tax Issues

Fees: \$99.00

Total Time: 0.2

This category includes time spent assisting the Trustee and his professionals with tax matters.

ACTUAL AND NECESSARY EXPENSES

11. A summary of actual and necessary expenses incurred by CBCC for the Application Period is attached hereto as Exhibit A. CBCC charges photocopying charges at \$0.10 per page. In addition, CBCC uses outside copier services for high volume projects, and this application seeks recovery of those costs, if applicable. CBCC also charges clients \$0.25 per page for outgoing facsimile transactions and does not charge for incoming facsimile transactions. Online legal research (Westlaw, PACER) is charged at CBCC's actual cost.

12. CBCC believes the foregoing rates are market rates that are equivalent to what many law firms comparable to CBCC charge clients for such services. The reasonable value of the expenses incurred by CBCC to the Trustee in connection with this matter during the Application Period is \$87.79.

RELIEF REQUESTED

13. Pursuant to this Fee Application, CBCC requests allowance of compensation for actual and necessary professional services rendered in the amount of \$4,820.50, and reimbursement of reasonable and necessary out-of-pocket expenses in the amount of \$87.79.

14. At all relevant times, CBCC has been a disinterested person as that term is defined in section 101(14) of the Bankruptcy Code and has not represented or held an interest adverse to the interest of the Trustee.

15. All services for which compensation is requested by CBCC were performed for or on behalf of the Trustee.

16. CBCC has received no payment and no promises for payment from any source other than the Debtors' estates for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Fee Application. No agreement or understanding exists between CBCC and any other entity for the sharing of compensation received or to be received for services rendered in or in connection with these cases. CBCC has received no retainer in this matter.

17. The professional services and related expenses for which CBCC requests allowance of compensation and reimbursement of expenses were rendered and incurred in connection with these cases and the discharge of CBCC's professional responsibilities as attorneys for the Trustee. CBCC's services have been necessary and beneficial to the Trustee, creditors and other parties in interest.

18. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount of fees requested by CBCC is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code.

CERTIFICATION

19. The undersigned hereby certifies that this Final Fee Application complies with Local Rule 2016-1(g). To the extent this First and Final Fee Application does not comply with any provision of Local Rule 2016-1(g), CBCC hereby respectfully requests a waiver thereof.

NOTICE

20. As required by the Bankruptcy Rules, notice of this First and Final Fee Application will be provided to the Office of the United States Trustee and to all parties that have requested notice pursuant to Bankruptcy Rule 2002. CBCC respectfully submits that such notice is reasonable and appropriate under the circumstances and asks that the Court approve such notice of this First and Final Fee Application.

WHEREFORE, Chipman Brown Cicero & Cole, LLP respectfully requests that the Court enter an order, in the form attached hereto (i) approving this First and Final Fee Application on a final basis, (ii) providing allowance of (a) \$4,820.50 as compensation for reasonable and necessary professional services rendered to the Trustee and (b) \$87.79 for reimbursement of actual and necessary costs and expenses incurred, for a total of \$4,908.29, (iii) authorizing the Trustee to pay CBCC the outstanding amount of such sums, and (iv) granting such other and further relief as the Court deems proper and just.

Dated: February 28, 2025

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Bryan J. Hall

Bryan J. Hall (No. 6285)

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